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July 20, 2023

VIA ECF

Hon. Miroslav Lovric
U.S. Magistrate Judge
U.S. District Court
Northern District of New York
Binghamton U.S. Courthouse
15 Henry St.
Binghamton, NY 13901

Re: *Honeywell Int'l Inc. v. Buckeye Partners, L.P. et al.*, No. 5:18-cv-00646-FJS-ML; *Honeywell Int'l Inc. v. Energy Transfer (R&M), LLC et al.*, No. 5:18-cv-01176-FJS-ML; *Honeywell Int'l Inc. v. CITGO Petroleum Corp.*, No. 5:19-cv-01219-FJS-ML (*consolidated*)

Dear Judge Lovric,

Pursuant to the Court's May 9, 2023 Text Order, ECF No. 354, all parties to the above-referenced matters conferred and provide the Court with the following status report:

Since our last joint status report filed on May 5, 2023, ECF No. 353, the parties have and are continuing to work diligently and cooperatively to respond to multiple sets of discovery requests, including recent requests from YAD Defendants. The parties have also exchanged additional deficiency letters regarding productions and conducted meet and confer sessions to informally resolve issues.

Since May, the parties have produced over 800 additional documents comprising nearly 33,000 pages; in total more than 27,000 documents, and nearly 1.1 million pages of documents have been produced in these consolidated cases. The parties continue to review the large volumes of documents that have been, and are still being, produced on a rolling basis.

In the near term, the parties intend to continue producing documents and completing their responses to the outstanding discovery requests and will propound further discovery, as needed. The parties anticipate that they will continue to work cooperatively and diligently through the discovery process.



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With respect to mediation, since their last report the parties conferred with the mediator, Michael Last, regarding process issues and have an additional conference scheduled. The parties report that they are preparing background materials for Mr. Last to review in advance of receiving the mediation briefs. The initial mediation session is scheduled for October 25-27, 2023.

All parties consented to my filing this joint status report on their behalf.

Sincerely,

/s/ Tyler L. Burgess

Tyler L. Burgess

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